

UNIT STATES ENVIRONMENTAL PROTECTIC. AGENCY

SDMS Document



67874

JUL 16 1986

CERTIFIED MAIL--
RETURN RECEIPT REQUESTED

William P. Ward
General Motors Corporation
General Motors Technical Center
Warren, MI 48090-9015

Re: Administrative Orders Index No. II-C
concerning the Scientific Chemical E
216 Paterson Plank Road, Carlstadt,

Dear Mr. Ward:

As you are aware, the Remedial Investig to be conducted pursuant to the above-r Orders, has been delayed due to the Rem being performed by Inmar Associates. T sists of the proper disposal of PCB-lad and removal of the tanks which contain removal of visibly contaminated soil in the tanks. To date, Inmar has removed the liquid phase of mater... from the tanks; the sludges remain to be addressed. At the present time, it does not appear that all aspects of the Removal Action will be completed before late August.

EPA agrees with the Committee's position (outlined in your letter dated September 30, 1985) that the commencement of the RI prior to the tank removal would inhibit the proper performance of the study. The presence of the tanks would interfere with the geophysical and topographic surveys, location of wells and soil sampling program. In addition, if any material is spilled during tank removal, such contamination would not be quantified during the RI; this would necessitate additional studies.

Attached you will find EPA's comments on Dames & Moore's Draft Project Operations Plan. The extended comment period is due to the reasons outlined above, namely, our agreement to postpone the commencement of the RI until the Removal is completed.

PS Form 3811, July 1983 447-845

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<p>3. Article Addressed to:</p> <p>Tom Armstrong General Electric Co. 3135 Easton Turnpike WIA Fairfield, CT 06431</p>	
<p>4. Type of Service:</p> <p><input type="checkbox"/> Registered <input type="checkbox"/> Insured <input type="checkbox"/> Certified <input type="checkbox"/> COD <input type="checkbox"/> Express Mail</p>	<p>Article Number</p>
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SYMBOL)

SURNAME)

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Pursuant to Paragraph 26.B of Administrative Order Index No. II-CERCLA-50114, EPA will be available to meet with you to discuss these comments. Please contact Janet Feldstein of my staff if you have any questions regarding these comments, or to arrange a meeting. Ms. Feldstein can be reached at (212) 264-0613.

Sincerely yours,

John V. Czapor, Chief
Site Investigation & Compliance Branch

Attachment

cc: Thomas M. Armstrong, General Electric Co. (certified mail)
Robert Soboleski, NJDEP
Christine Altomari, NJDEP
Gerard Coscia, Dames & Moore

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SCP-Carlstadt Site
Comments on Draft Project Operations Plan

Section

- 3.2 Reference is made to a sludge pit in the northwest corner of the site. NJDEP believes that lagoons/sludge pits were located in the northeastern portion of the site. Information obtained from aerial photographs should be featured on the site layout (figure 3-2).
- Fig. 4-2 The results from the geophysical surveys may influence the locations of the borings, monitoring wells and soil samples. However, this figure indicates that the final week of geophysical surveys will overlap with the initiation of the Phase I field work. It is recommended that time for review of the survey results and approval for modification of proposed locations be worked into the schedule.
- 5.2 What is considered QA documentation? (p.5-4)
- 5.3 The QA Manager is not described as a key person. What are the responsibilities of the QA Manager shown in Figure 5-1?
- 6.0 Are Sections 15 and 16 of the Plan required for QA to meet the project objective?
- 6.2.2 One trip blank is required for each set of containers per matrix returned to the lab. (see Section 14.1)
- 6.3 The addition of a few "random" soil samples would help to alleviate the "built-in" bias.
- 7.2.3 This criteria for PPE is incorrect. See Comments on Appendix B.
- 7.2.4.1 All disposable PPE cannot be stored on site; it should be disposed of at an EPA-approved facility.
- 7.2.6 The list of chemicals which appears in Table 7-1 is totally incomplete as a guide to the "types and possible concentrations that may be encountered...". The types and possible concentrations are still unknown and could be diverse.
- 7.4 It may be necessary to do some fence repair, as access cannot presently be controlled, and there may be a danger of vandalism to equipment, etc.

Section

7.6

As stated previously, an additional objective of the geophysical survey is to help finalize the locations of borings, monitoring wells, and soil samples. Also, in sections related to the borings, monitoring wells, and soil sampling, it should be mentioned that the locations will be finalized after evaluation of the results of the geophysical survey.

The Refraction Survey (see Work Plan) was not included in this Plan. This should be corrected.

There is no description of format for results from the geophysical surveys. EPA should be provided with the results as soon as they become available.

Clarify if "continuously" means split spoons every two feet.

7.7.5.4

The monitoring wells must be constructed entirely of stainless steel, type 316, unless adequate justification for use of type 304 can be provided.

Screen slot size determination can be determined in advance.

It is recommended that the results of the OVA head space analysis also be used as a guide for collection of the most contaminated sample, in addition to visual evidence of discoloration (see Section 6.3)

7.7.5.7

To minimize the risk of contamination, it is suggested that the air-lift system not be used. Centrifugal pumps could be used for the shallow wells and submersible pumps for the deep wells.

Development water should not be discharged to the ground, but should be collected for future analysis and treatment.

The Work Plan suggested "permeability testing of the clay layer." This should be included in the POP.

7.8

For studying the tidal influence on the aquifers, the tidal staff should be located close to the selected well pairs (either MW-5S/5D or MW-7S/7D) for installation of water level recorders rather than the location shown on figure 7-3. The well pairs should be selected after the results of the geophysical survey.

Section

7.8 The frequency for taking readings should be specified, to insure that adequate data is collected. It is suggested that hourly readings be taken during the daytime survey hours.

7.9.5 The purged water should not be discharged to the ground surface.

Where are the sampling forms which will be used?
(Item 12)

The polypropylene line on the bailers must be monofilament.

Cleaned bailers should be wrapped in heavy gauge aluminum foil during transport, not polyethylene bags.

All sample bottle labels should include the following information:

- | | |
|------------------------------|---------------------------------|
| a. site name | f. type of sample(comp/grab, et |
| b. sample number | g. sample volume |
| c. name of collector | h. analysis required |
| d. date & time of collection | i. preservative |
| e. place of collection | |

Metals samples must be taken unfiltered, i.e. as total metals, in order to more fully characterize the site contamination. Dissolved metals samples may then be taken in addition.

The proper cleaning procedure for all sampling equipment is as follows:

- a. wash with a low phosphate detergent;
- b. tap water rinse;
- *c. rinse with a 10% nitric acid solution;
- d. tap water rinse;
- e. acetone rinse or methanol followed by hexane rinse;
- f. deionized water rinse; and
- g. air dry.

*NOTE If no metals samples are being taken the 10% nitric acid rinse may be omitted.

Drilling equipment should be steam cleaned.

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Section

- 7.10 Dames & Moore should consider including some sediment samples from drainage ditches at the site.
- It is not clear that Dames & Moore has considered the complex nature (i.e., tidal influences) of the creek in designing a sampling program.
- 7.10.5.1 Containers with preservative added should not be immersed in the surface water because of probable loss. Preservative should be added after the sample has been collected.
- 7.10.5.2 Sediment samples should be taken with stainless steel or brass corers, or corers having removable Teflon or glass inner liners. These will better insure the integrity of the surface layer of sediments and will minimize the loss of fine-grained material.
- 7.11 The samples to be collected from the unsaturated zone may not provide a good indication of the contamination potential from surface runoff and erosion. The concentrations of certain contaminants which are strongly sorbed by soils (such as PCBs) may be highest in the shallowest soils. Therefore, it is recommended that at least some soil samples be collected at depths of 0-6 inches. Appropriate areas for collection of such samples would include the tank farm areas where PCBs were stored.
- 7.12.5 It is not recommended that any plastic material be used during sampling.
- There is no plan for sampling storm surface runoff.
- 7.13 This investigation should include the identification of all underground storage tanks and pipelines. NJDEP believes that the discharge line from the main storage tank pit is closed off by valve, and its contents are unknown. NJDEP believes that another discharge line exists from the drain system for the thin film evaporator. Allowance should be made for a number of samples from these lines and from any tanks which are discovered. (Table 7-4)
- What program does the Dames & Moore QA Manager follow?
- 7.14 Air monitoring must be conducted in conjunction with all site activities and the information gathered must be recorded and submitted in the Draft RI Report.

Section

- 8.0 Is training documented?
- 9.0 Are calibration records retained on site? What calibration records are required? How is calibrated equipment uniquely identified? Are the instruments used for H&S purposes separately controlled from those used for sample monitoring?
- 10.0 Table 10-1 The term "indicator parameters" should be clearly defined. It is recommended that these include all volatile organics, due to the complex site history and potential mobility of these contaminants.
- Table 10-2 Pollutants previously found at the site should be targets for analysis (see Table 7-1)
- 11.0 Where is the Tier I and Tier II format described?
- 12.0 Copies of all audit reports and audit findings should be made available to EPA.
- What is the basis for audit checklist items contained on Figure 12-1?
- 14.1 NJDEP policy requires that field blanks be generated for each sampling event and each matrix, in addition to trip blanks.
- 14.2 It is suggested that a Tier I analysis program be mentioned in Section 10.0.
- Is the computer program used for data reduction verified?

Appendix A

The QA Short form has no parameter table. This is necessary for EPA's review. (See EPA's "Guidance for Preparation of Combined Work/Quality Assurance Plans for Water Monitoring," May 1983.)

Table A-1 of the short form should reference Table 10-2 for "priority pollutants."

What program does the Dames & Moore QA Manager follow when assuring the final validation of the data?

Appendix A

The data gathered will be used to assess the nature and extent of contamination at the site. Analysis of the data will include an assessment of the threats posed to the public health, welfare or the environment. The feasibility study will include the development and evaluation of remedial alternatives to mitigate the threats to the public health, welfare or the environment.

Appendix B

1. The responsibilities of the On-Site Safety Officer must be described in detail such responsibilities may include:
 - ° Site activities during level A, B or high hazard C activities;
 - ° Approval procedures to determine personnel qualified to work on-site;
 - ° Training activities to implement procedures in this plan;
 - ° Stop work authorization; and
 - ° Approval procedures in changing the Dames & Moore Health and Safety plan.
2. Calibration of the PID, OVA and CGI must include regular calibration using the appropriate ultra-zero and indicator gas (Methane, Isobutylene, etc.). Electronic zeroing is not a sufficient calibration procedure.
3. There is no mention throughout this document on protocols for conducting air samples using the PID, FID, CGI or other sampling methods. Such protocols must be developed to detail where and how sampling must be conducted during each major operation (drilling, tank sampling, surface sampling, etc.).
4. The Action Level Criteria in Table 3 (Appendix B) and referenced in Section 7.2.3 should be modified as designated in EPA Guidance document titled Standard Operating Safety Guides, November, 1984;

<u>Hazard</u>	<u>Monitoring Method</u>	<u>Action Level*</u>	<u>Level</u>
Unknown toxic vapors	PID	<.2 ppm	D
	PID>.2ppm,	<5ppm	C
	PID >5ppm,	<500ppm	B
	PID	500ppm	A

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<u>Hazard</u>	<u>Monitoring Method</u>	<u>Action Level *</u>	<u>Level</u>
Known Toxic Vapors	PID/OVA, Detector Tubes, Others	>TLV**	C
Same as above		>10(x)TLV	B

* Levels above background.

** TLV -Treshold Limit Values as defined in the 1984 - 1985 Threshold Limit Value Booklet published by the American Governmental Industrial Hygienists.

5. Levels A, B, C, and D should be described in detail in Table 4 (Appendix B) to conform with EPA Guidance document titled "Standard Operating Safety Guides," November 1984.
6. The use of detector tubes as a primary means of determining levels of protection has limitations. The tubes should be used only in support of PID/FID monitoring only.
7. All personnel operating at the SCP site in areas requiring Level D, C or B personal protective equipment should participate in a medical surveillance program which qualifies them to work at a hazardous waste site and wear respiratory protection. They also should have attended a formalized hazardous waste health & safety training course equivalent to the REM III 3-day Fundamental Health & Safety training requirements.

8. Emergency Produres

Phone numbers of the local hospitals and Poison control center should be added to the Emergency contact list. In addition EPA should be notified.

Evacuation Routes and Emergency Procedures should be posted at the Site.

Investigation should be made regarding the nearest emergency medical treatment facility and its ability to handle chemical exposure cases. Arrangements should be made for treating, admitting and transporting injured personnel to such facility.

The location, directions to, travel time to, and telephone number of this facility should be posted at the site.

Local officials should be contacted to establish procedures for evacuation, prior to commencement of the RI/FS.

A List of Emergency Equipment which will be on site should be included in this plan.

Emergency eye washes should be located on the "hot" side of the contamination reduction zone or work area. All personnel must pass through the contamination reduction zone to enter or exit the exclusion zone.

An emergency shower or spray cans should be located on the clean side of the contamination reduction area.

HASP-General

At the end of the work day, all personnel working in the exclusion area shall take a hygienic shower.

All supplied breathing air shall be certified as grade D or better.

Where practical, all tools/equipment will be spark proof, explosion resistant; and/or bonded and grounded.

Fire equipment will be on-site for use on equipment or small fires only.

Since site evacuation may be necessary if an explosion, fire or release occurs, and individual shall be assigned to sound an alarm and notify the responsible public officials if required.

A daily safety meeting will be conducted for all site personnel. The safety procedures, the day's planned operations, any changes in safety requirements, and site hazards should be discussed.

Disposable clothing and other decontamination equipment and solution must be disposed of off-site at an approved facility.

Prior to first time entry, the site must be checked for radioactivity, explosivity and oxygen deficiency.

A work/rest schedule to compensate for possibility of heat stress should be established.

It should be noted that there is the possibility of personnel encountering substances other than those listed in Tables 1 and 2.

Miscellaneous

When are sample bottles to be labeled (in the field prior to sampling or after?)

Further soil sampling should be done in the northeastern corner of the site.

An additional two borings should be made in the southern quadrant of the site to better characterize this area.

All well screens and casings must be schedule forty stainless steel.

Downhole air monitoring using a PID or OVA should be performed during the drilling of all wells and piexometers. Ir readings should be recorded with the geologic logs.

Exact procedures for water level measurements should be included in the POP.

Drilling equipment should be steam cleaned.

NJDEP questions whether the screen intervals for the shallow wells should include formations above and below the meadow mat.

Dames & Moore should include providing split samples to EPA's designated representative in its description of field activities.

Cleaning and rinse water should not be discharged to the ground surface.

The legal requirement for holding time for volatile organics is 7 days, not 14 days as is stated in ETC's SOP manual.